

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION,)
Plaintiff,)
v.) Civil Action File No.
HORNBEAM SPECIAL) 1:17-cv-3094-WMR
SITUATIONS, LLC, et al.,)
Defendants.)

**DEFENDANT PATRICIA BRANDMEIER ROBINSON AS EXECUTOR OF
THE ESTATE OF JERRY L. ROBINSON'S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Defendant Patricia Brandmeier Robinson as Executor of the Estate of Jerry L. Robinson (the "Estate"), pursuant to FRCP 56, LR 56 and LR 7.1, and moves the Court for a summary judgment on Counts I, II, IV, V and VI of the Federal Trade Commission's ("FTC") Second Amended Complaint for Injunctive and Other Equitable Relief ("SAC"). This Motion is based upon:

- (a) The full record in the case;
- (b) The attached Statement of Undisputed Material Facts ("SUMF"); and
- (c) The attached Memorandum of Law.

Dated: August 10, 2021

Respectfully submitted,

DOVIN | FICKEN LLC

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CERTIFICATE OF SERVICE

This is to certify that, in accordance with the Local Rules for the Northern District of Georgia, LR 5.1A, I have this day electronically filed the within and foregoing DEFENDANT PATRICIA BRANDMEIER ROBINSON AS EXECUTOR OF THE ESTATE OF JERRY L. ROBINSON'S MOTION FOR SUMMARY JUDGMENT in the above-styled case with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all counsel of record.

This 10th day of August, 2021.

/s/ Allison S. H. Ficken
Allison S. H. Ficken
Georgia Bar No. 355875

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1 and 7.1, the undersigned certifies that this document has been prepared using Times New Roman 14 point font and does not contain more than 10 characters per inch of type.

/s/ Allison S. H. Ficken
Allison S. H. Ficken
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